

III. Congregational or Conference Employment & Eligibility Information

This section contains the following information:

- A. Temporary Eligibility Requirement Adjustments/Relief for The Corinthian Plan.
Reminder: Eligibility for credentialed employees is 20 hours, non-credentialed employees is 30 hours.
- B. Potential relief for congregations from expanded Family Medical Leave Act (FMLA) and the Emergency Paid Sick Leave Act (EPSLA).
- C. Employer instructions for documenting and reporting employee hours or status, leave of absence, laid off/terminated employee status and The Corinthian Plan coverages.

A. TCP Temporary Eligibility Requirement Adjustments/Relief

Because of the COVID-19 outbreak, congregations or conference offices may need to adjust hours their employees work, or status, due to finances or change in workload. The Corinthian Plan (TCP) is providing some temporary relief during the COVID-19 outbreak. As local employers, congregations or conferences must keep an official record of decisions related to how employees changing hours or employment status will be treated, for TCP purposes and for our reinsurance carriers.

The following adjustments will be reviewed as we continue to monitor the impact of the COVID-19 outbreak in the United States.

- 1. Employees with a reduction of hours below TCP eligibility due to the COVID-19 outbreak.** *TCP will extend coverage through 12/31/20, for employees with a reduction of hours that takes them below 20 hours for credentialed employees, and 30 hours for non-credentialed employees, due to the impact of the COVID-19 outbreak.*
- 2. Leave of Absence or Furloughed employees related to the COVID-19 outbreak.** *TCP will extend coverage through 12/31/20, for employees on official Leave of Absence or Furlough due to the impact of COVID-19. Leave of Absence or Furloughed in this case means an employee is not working due to the impact of the COVID-19 outbreak, but the employer (church or conference office) intends to bring them back to work. This can be paid or unpaid time.*

Note: For 1 and 2 above. If, at the end of the timeframes stated above, the employee does not meet regular eligibility, he or she will be offered Continuation coverage for CEP health plan and/or VSP vision plan coverage, which allows the same coverage to be continued for up to 18 months. Continuation coverage is not available for dental plan coverage. The individual will be billed directly for Continuation coverage. The

congregation or conference will need to send a cancellation form for the employee to Everence.

3. Laid-off or terminated employees. *There is no extension of TCP eligibility for employees laid off or terminated by congregations or conference due to COVID-19. However, they will be offered Continuation coverage for CEP health plan and/or VSP vision plan coverage for up to 18 months.* The congregation or conference will need to send a cancellation form for the employee. The laid-off or terminated employee will be billed directly for Continuation coverage.

Laid off or terminated, in this instance, means that the employer does not intend to bring the employee back to work. (Definition of employee is actively working hours or on approved leave of absence/sabbatical/furlough. Any “severance” package a congregation or conference office chooses to give a former employee does not constitute them continuing as an employee.)

B. Potential relief from expanded Family Medical Family Leave Act (FMLA), and Emergency Paid Sick Leave Act (EPSLA)

Recently passed federal legislation extends leave, on a temporary basis through 2020, to churches in relation to the COVID-19 outbreak in the United States. Congregations may choose to avail themselves of these provisions but *must* meet requirements of the legislation.

The Corinthian Plan will recognize employees of congregational or conference employers that meet the requirements of these temporary COVID-19 related provisions.

- Expansion of the Family Medical Leave Act (FMLA) during the COVID-19 outbreak includes congregations. The Expanded FMLA relates to care of children due to a public health emergency.
- Emergency Paid Sick Leave Act (EPSLA). There are six qualifiers that relate to the impact of COVID-19.

Please seek guidance and help regarding eligibility through Federal Guidelines regarding meeting qualifying requirements as well as tax credits/reimbursement from your legal counsel or accountant. Another helpful resource related to this is:

<https://www.churchlawandtax.com/>. Look for the article *How New FMLA Changes Will Affect Churches During the Coronavirus Outbreak*.

C. Employer (congregation or conference) instructions when making reduction of hours below TCP eligibility, granting a leave of absence, furlough, etc.

We are dependent on you, the local employer, to let us know of staffing changes you make that effects TCP coverages. It is especially critical during the COVID-19 outbreak. This information is not only important for TCP, but for documentation for our reinsurance carriers (for large claims).

Please use the following process in your organization for TCP purposes.

1. Consult with The Corinthian Plan staff regarding COVID-19 eligibility adjustments. Contact information is at the bottom of the enclosed cover letter.
2. Decide what kind of COVID-19-related change you are making, and how it affects TCP required eligibility hours of 20 per week for credentialed and 30 per week for non-credentialed employees.
3. If the COVID-19-related changes impact eligibility, then decide where these changes fit with the temporary adjustments for TCP eligibility requirements. That is, for TCP purposes which category does the employee now fit into:
 - Active employee with reduction of hours (Extension through 12/31/20)
 - On Leave of Absence or Furlough (Extension through 12/31/20)
 - Leave through FMLA or EPSLA
 - Laid Off or Terminated (No extension, but offer of Continuation)
4. The official decision-making body of the congregation makes the decision, documenting the following in their records/minutes:
 - a. Change of status to one of four categories listed above,
 - b. COVID-19 reason (change of workload, finances...) for change of status,
 - c. Date of decision, and
 - d. Estimated duration if continuing in one of the employed categories.
5. Inform The Corinthian Plan of these changes and keep us informed with other changes along the way.

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